

EXHIBIT L

Shawn G. Hansen (SBN 197033)
shansen@nixonpeabody.com
Jennifer Hayes (SBN 241533)
jenhayes@nixonpeabody.com
NIXON PEABODY LLP
2 Palo Alto Square
3000 El Camino Real, Suite 500
Palo Alto, CA 94306-2106
Telephone: 650-320-7700

Attorneys for Defendant
JF MICROTECHNOLOGY SDN BHD

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

JOHNSTECH INTERNATIONAL CORP.,

Plaintiff,

vs.

JF TECHNOLOGY BERHAD,
JF MICROTECHNOLOGY SDN BHD,
J FOONG TECHNOLOGIES SDN BHD

Defendants.

Case No. 3:14-cv-02864-JD

**JF MICROTECHNOLOGY'S FOURTH
SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF (EXPERT)**

PROPOUNDING PARTY: Defendant JF MICROTECHNOLOGY SDN BHD

RESPONDING PARTY: Plaintiff, JOHNSTECH INTERNATIONAL CORP.

SET NO: FOUR

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant JF Microtechnology SDN BHD ("JFM"), hereby requests Plaintiff Johnstech International Corp. ("Johnstech"), to produce the following documents for inspection and copying at the offices of Nixon Peabody, 2 Palo Alto Square, Suite 500, 3000 El Camino Real, Palo Alto, CA 94306 within thirty (30) days.

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DEFINITIONS AND INSTRUCTIONS

1. “Person” shall include any natural person or business, legal or governmental entity or association.

2. “You,” “your” or “Johnstech” shall mean Johnstech International Corp., and/or, where applicable, any predecessor or successor in interest, any of their officers, directors, representatives, affiliates, subsidiaries, agents, employees, attorneys and/or any other person(s) acting or purporting to act on their behalf.

3. “JFM” shall mean JF Microtechnology SDN BHD.

4. The “’866 Patent” shall mean United States Patent No. 7,059,866, entitled “Integrated Circuit Test Contact to Test Apparatus,” which issued on June 13, 2006.

5. “The Patent-in-Suit” shall mean the ‘866 Patent.

6. “Zigma” or “Accused Products” means the products described Plaintiff’s First Amended Complaint.

7. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

8. The term “document” means any written, printed, typed, or other graphic or photographic matter of any nature, any audio or video recordings, computer data, as well as disks or other devices storing such data, and other data compilations from which information can be obtained, and translated if necessary by you through detection devices into reasonably usable form. A draft or non-identical copy is a separate document within the meaning of this term.

9. When referring to a person, to “identify” means to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

10. When referring to documents, to “identify” means to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) date of the document; (iv) author(s), addressee(s) and recipient(s); and (v) Bates number.

1 11. When referring to communications, to “identify” means to give, to the extent
2 known, the (i) names, addresses and last known places of employment of the participants to the
3 communication; (ii) the subject matter of the communication; (iii) the location(s) of the
4 communication; (iv) the mode of communication (e.g., written, by telephone, meeting, etc.); and
5 (v) the date of the communication.

6 12. The terms “plaintiff” and “defendant,” as well as a party’s full or abbreviated
7 name or a pronoun referring to a party, means the party and/or, where applicable, any predecessor
8 or successor in interest, any of its or their officers, directors, representatives, affiliates,
9 subsidiaries, agents, employees, attorneys and/or any other person(s) acting or purporting to act
10 on their behalf. This definition is not intended to impose a discovery obligation on any person
11 who is not a party to the litigation.

12 13. The term “concerning” means relating to, referring to, describing, evidencing or
13 constituting.

14 14. The term “related to” means, without limitation, related to, referencing, reflecting,
15 evidencing, concerning, constituting, contradicting, disclosing, detailing, and/or describing.

16 15. The terms “all” and “each” shall be construed as all and each.

17 16. The connectives “and” and “or” shall be construed either disjunctively or
18 conjunctively as necessary to bring within the scope of the discovery request all response that
19 might otherwise be construed to be outside of its scope.

20 17. The use of the singular form of any word includes the plural and vice versa.

21 18. When information otherwise discoverable is withheld by claiming that it is
22 privileged or subject to protection as trial-preparation material, you shall make the claim
23 expressly and shall describe the nature of the documents, communications, or things not produced
24 or disclosed in a manner that, without revealing information itself privileged or protected, will
25 enable other parties to assess the applicability of the privilege or protection as required by Rule
26 26(b)(5)(A) of the Federal Rules of Civil Procedure.

27 19. These Requests are continuing and must be supplemented as required by Rule
28 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 94:

Any and all source data used to create the document produced as native Excel file

JOHNSTECH007981.

REQUEST FOR PRODUCTION NO. 95:

A complete copy of the data in Johnstech's AX System from which the document produced as native Excel file JOHNSTECH007981 was created.

REQUEST FOR PRODUCTION NO. 96:

Any and all logs and/or other documents reflecting access to Johnstech's AX System in connection with the preparation of the document produced as native Excel file

JOHNSTECH007981 was created.

REQUEST FOR PRODUCTION NO. 97:

Any and all communications and documents that reflect how source data was identified for inclusion in the document produced as native Excel file JOHNSTECH007981.

REQUEST FOR PRODUCTION NO. 98:

Any and all communications and documents that reflect how source data was processed for inclusion in the document produced as native Excel file JOHNSTECH007981.

REQUEST FOR PRODUCTION NO. 99:

Any and all communications and documents that reflect the filters used on the columns "Is Sales", "PRODUCTCLASS", "ITEMGROUPID", and "Cust Country" in the document produced as native Excel file JOHNSTECH007981.

REQUEST FOR PRODUCTION NO. 100:

Any communications and documents that reflect the testing conducted by Micro CT.

Dated: December 16, 2015

NIXON PEABODY LLP

By: 

Shawn Hansen

Attorneys for Defendant

PROOF OF SERVICE

I am a citizen of the United States and employed in Santa Clara County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2 Palo Alto Square, 3000 El Camino Real, Suite 500, Palo Alto, CA 94306-2106. On December 16, 2015, I served a copy of the within document(s):

**JF MICROTECHNOLOGY'S FOURTH SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS TO PLAINTIFF (EXPERT)**

- ☐ **(BY MAIL)** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Palo Alto, California addressed as set forth below.
- ☒ **(BY E-MAIL)** by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Robert P. Andris
Michael D. Kanach
GORDON & REES LLP
275 Battery, Ste. 2000
San Francisco, CA 94111
Tel: (415) 986-5900
Fax: (415) 986-8054
E-Mail: randris@gordonrees.com
mkanach@gordonrees.com

Courtland C. Merrill
Dan Hall
Anthony Ostlund
BAER & LOUWAGIE P.A.
90 South Seventh Street, Ste. 3600
Minneapolis, MN 55402
Tel: (612) 349-6969
Fax: (612) 349-6996
E-Mail: cmerrill@anthonyostlund.com
dhall@anthonyostlund.com

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 16, 2015, at Palo Alto, California.


Gina Henley

4827-3609-2204.1